



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 16 2015

REPLY TO THE ATTENTION OF:

WN-16J

Pretreatment Program Coordinator
City of West Chicago WWTP
Route 59 & 38, Sarana Drive
West Chicago, IL 60185

Re: Use of numeric guidelines in sewer use ordinances

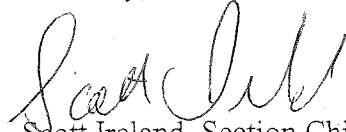
Dear Pretreatment Program Coordinator:

The U.S. Environmental Protection Agency (EPA), Region 5 (Region) as Approval Authority for Publicly Owned Treatment Works (POTW) pretreatment programs in the states of Illinois and Indiana would like to inform your approved program of a recent decision the Region made regarding the use of guidelines for discharge in sewer use ordinances (SUOs). The Region has recently reviewed SUOs that contain a section of numeric limits written as guidelines as well as a section of numeric limits as local limits. The numeric limits in the guidelines section are usually for conventional pollutant parameters which the POTW may or may not incorporate into industrial user control mechanisms while the numeric limits in the local limits section are all incorporated into the industrial user control mechanisms.

The Region will not be approving any sewer use ordinances that contain the numeric limits as guideline language. EPA's position is that the inclusion of the aforementioned guideline language is confusing to industrial users and may lead to enforceability issues with the industrial user control mechanisms and SUOs. For those approved programs that currently have such language (i.e., guidelines) in their SUOs, EPA requests that the POTW modify its SUO to remove this language as soon as possible. The POTW should then submit all modified documents for EPA review via email to r5npdes@epa.gov.

If you have any questions related to this matter, please contact me at 312-886-8121 or ireland.scott@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Ireland", written in a cursive style.

Scott Ireland, Section Chief
NPDES Programs Branch

cc: Roger Callaway, IEPA